

From: Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov
Subject: RE: [EXTERNAL] Re: OneTaste - Motion to Quash Meet and Confer
Date: May 18, 2023 at 11:37 AM
To: Paul Pelletier pepelletier3@gmail.com
Cc: Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

Hi Paul,

As you are aware from multiple subpoenas issued to OneTaste, court filings, and our prior discussions, the government is investigating OneTaste and its current and former leaders for potential sex trafficking, forced labor, money laundering, and other offenses. In our subpoenas and court filings, and also in the email below, we have identified a number of specific categories that are relevant to our investigation. These categories of information relate directly to compensation promised to OneTaste employees, compensation earned by OneTaste employees, living and work conditions of OneTaste employees, and OneTaste employees' engagement in sexual acts and romantic relationships, and the voluntariness of their participation in such acts and relationships. We have also identified a number of particular individuals who are relevant to our investigation. We are not sure what you mean by "it" in your email below, but we believe that this information provides you with more than sufficient notice of the subject of our investigation.

With regard to privilege, we cannot agree to an exemption to the normal rules governing a privilege waiver, but we believe we can have a productive discussion about the general substance of the interviews without waiving any privilege or protection. We also do not intend to share with you information about witnesses who we have interviewed or who have testified before the grand jury, and did not understand that to be a prerequisite to your offer to share with us facts witnesses shared with you during the interviews.

Your email to us raises a few questions:

1. You do not state in your email that you are willing to share information that we have requested about each individual's employment status, duties, contract(s) with OneTaste and its affiliated companies, and terms of his/her employment. Do you plan to share that with us? We do not believe it is privileged or covered by any work product protection.
2. You do not state in your email whether you are willing to identify statements the interviewed individuals have made regarding any of the topics listed in our email, or whether you will even tell us whether or not such interviewees discussed the identified topics at all. Do you intend to share that information with us?
3. We understand that [REDACTED] and [REDACTED] reside overseas. Are you able to assist us in contacting them for interviews?

We want to make sure that if we meet and confer, the meeting is productive. If you are not willing to share information that any of the interviewed witnesses disclosed about topics we have identified as directly relevant to our investigation, we cannot see how meeting will help us narrow down or prioritize our requests for the recorded interviews.

Thank you,

Gillian